

Geoff Baker

From: Geoff Baker [gabaker@dowellbaker.com]
Sent: Tuesday, March 04, 2008 10:47 AM
To: 'Edward Manzo'
Cc: 'Jason Smalley'; 'Louis Alex'; 'Joel Bock'; 'Francissen, Vern'; 'Karton, Robert'; 'GDSmith@dowellbaker.com'; 'Tony Dowell'
Subject: FW: ROUGH ASCII - H. MARCHIONNE - 3/3/08

Ed,

Within the next seven days, please identify by page and line number on the attached rough draft the portions of Mr. Marchionne's testimony that you would like to designate as Confidential. Please also let us know by when we will hear back from you regarding our revisions to the proposed protective order.

Additionally, please update us on the availability of Messrs. Ito, Nakagiri and Ichikawa to sit for depositions and where you would like those depositions to take place. Likewise, we need a new date for MMU; that date will need to be at least late next week because we will need time to review the four boxes produced during Mr. Marchionne's personal deposition yesterday and any other documents that you produce in response to our 30(b)(5) requests – we would also like either confirmation that no additional documents are forthcoming or a date certain for the production of all additional responsive documents. It would also be helpful if you could identify what bates ranges apply to Mr. Olczak since his deposition is supposed to commence in three hours. It was our understanding from Jason Smalley that he would be providing those document numbers yesterday afternoon. We did not hear from him on that issue.

Please also provide us with the full name of Mr. Gen. We also need dates for the depositions of Mr. Gen and Mr. Nakasawa, as well as Mr. Saito. Additionally, please provide us with the names and positions of all Miyano Machinery Inc. employees who attended the 2004 and/or 2006 IMTS.

Further, we will need to come to an agreement on a more appropriate due date for our response to your PI motion. As you mentioned, you are unavailable part of next week due to other professional obligations. We are certainly understanding of your schedule. However, because of the limited time and the slow pace of discovery thus far, we are in need of additional time to adequately address the preliminary injunction motion. We propose a new response date of April 18.

Thank you.

Geoff

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From: Jerry Satterlee, C.S.R. [mailto:mail@jerrysatterlee.com]
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Subject: ROUGH ASCII - H. MARCHIONNE - 3/3/08

ROUGH ASCII ATTACHED AS REQUESTED

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